

North Hertfordshire District Council

By email only

Date: 2nd August 2024

FAO Andrew Hunter

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 24/01175/OP

Site: Recreation Ground, Orchard Close, St Ippolyts, Hertfordshire

Proposal: Outline Application: Erection of multipurpose pavilion following demolition of existing changing rooms (all matters reserved)

Sport England Reference: PA/24/E/NH/68200

Thank you for consulting Sport England on the above application.

Sport England's Position

It is not currently possible for Sport England to make an informed assessment of the application against the National Planning Policy Framework (NPPF), in particular paragraph 103, and Sport England's Playing Fields Policy. We therefore submit an **objection** as a statutory consultee pending receipt of the information set out below.

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 103, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document':

www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions. A summary of the exceptions is provided in the annex to this response.

The Proposal and its Impact on the playing field

In summary, the proposal involves an outline application for the demolition of the existing changing rooms and the erection of a new pavilion to replace it on part of the playing field at St Ippolyts Recreation Ground. The footprint of the new pavilion, while partly on the site of the existing changing rooms, would encroach further south and east into the playing field area.

Assessment against Sport England's Playing Fields Policy and NPPF

In principle, a proposal for a new pavilion to replace an existing changing facility would offer potential to accord with exception 2 of the above policy. While limited information has been provided in support of the planning application it is anticipated that the new pavilion would provide higher quality changing and social facilities for supporting the use of the playing field by the football and bowls clubs that are based on the site.

However, there is insufficient information to enable Sport England to adequately assess the proposal against exception 2 or to make a substantive response.

Please therefore could the following information be provided:

1. Existing and Proposed Playing Pitch Layouts: Site plans to scale showing the existing and proposed playing pitch layouts (with pitch and run-off dimensions) on the recreation ground. As shown in the recent aerial image below (taken in 2024 from Google Earth Pro) the football pitch is currently sited in close proximity to where the pavilion is proposed to be sited and would appear to encroach into the pitch and its run-off area. If the siting of the pavilion would either displace the pitch or result in there being only being space available for an undersized football pitch to be accommodated on the playing field this would not be considered to meet exception 2. I have consulted the Football Foundation (who represent the FA and Hertfordshire FA) and they have asked for this information as well to inform their position. A proposed playing pitch layout should show as a minimum how a 91 x 55 metre junior pitch (in accordance with the FA's recommended pitch sizes <https://www.thefa.com/get-involved/player/facility-development-and-technical-guidance>) with at least a 3m unobstructed perimeter run-off area could be accommodated

on the playing field if the pavilion was sited as proposed. This information is requested to allow an informed assessment to be made of the impact of the proposals on the playing field.



2. Pavilion Design and Layout: Clarity is requested is whether the floor plans and elevations of the pavilion are conceptual proposals that have been submitted for information given that the application is in outline with all matters reserved or whether these represent the plans that have been submitted for approval. An assessment of the design and layout of the pavilion would form part of our assessment against exception 2 but it is unclear what the status of the drawings are if this an outline application. Notwithstanding this, Sport England and the Football Foundation have reviewed the design and layout and would have the following comments and queries which it would be helpful to have a response to in order to inform our assessment:
 - Officials Changing Rooms: A second changing area for officials is recommended to allow changing space for officials of different genders if required. The second changing space does not need to be a dedicated changing room. Could the disabled toilet be designed to be used by officials when not required for disabled users. This would require a shower and benching to be included. Alternatively, could one of the bowls changing rooms double up as an officials changing room?
 - Football Team Changing Rooms: 16 sq.m of changing space per

changing room is required as a minimum (preferably 18 sq.m) to meet the Football Foundation's design guidance

<https://footballfoundation.org.uk/changing-pavilion-design-key-considerations> . This excludes the area for toilets, showers and lobbies.

As the areas proposed would appear to be less than these minimum recommendations this can this be reviewed?

- Showers: Open showers in team changing rooms are no longer supported by the Football Foundation for privacy and inclusiveness reasons. Showers should be provided as cubicles instead in accordance with the above guidance and 4 cubicles are recommended per changing room. Can this be reviewed?

This information is requested to allow an informed assessment to be made of whether the design and layout of the proposed pavilion will be fit for purpose for meeting the needs of the users.

Sport England's position

Sport England's interim position on this application is to submit an **objection** which is our standard position for any proposal where insufficient information has been provided to allow a substantive response to be provided as a statutory consultee and should not be interpreted as being indicative of our position once the requested information has been provided. We will review our position following the receipt of the further information requested above and will then, in accordance with the Order respond within 21 days.

I would be pleased to discuss this response (with the LPA/applicant/agent) if this would be helpful.

If you would like any further information or advice, please contact the undersigned.

Yours sincerely,

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Sport England's 'Playing Fields Policy and Guidance Document' is available to view at: www.sportengland.org/playingfieldspolicy

The Five Exceptions to Sport England's Playing Fields Policy are:

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site;
- or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.